

EXHIBIT C

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF VIRGINIA

3
4 THE COLEMAN COMPANY, INC.,)

5 Plaintiff,)

6 vs.) No. 2:2020cv00351

7 TEAM WORLDWIDE CORPORATION,)

8 Defendant.)

9
10
11 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION OF

12
13 GLEN STEVICK, PhD

14 FRIDAY, AUGUST 20, 2021

15
16
17
18
19
20
21
22 REPORTED BY:

23 MARLA SHARP, RPR, CLR, CCRR, CA CSR 11924,

24 OR CSR 17-0446, UT CSR 11917368-7801

25 JOB NO. 198265

1 MR. HARKINS: And Robert Harkins of 09:03
2 RuyakCherian LLP for Team Worldwide and the 09:03
3 deponent. 09:03

4 THE VIDEOGRAPHER: Thank you. 09:03

5 Would the court reporter please swear in 09:03
6 the witness. 09:03

7 GLEN STEVICK, PhD, 09:03
8 called as a witness, having been duly 09:03
9 sworn by the certified shorthand 09:03
10 reporter, was examined and testified as 09:03
11 follows: 09:03

12 THE COURT REPORTER: Thank you. 09:03

13 Counsel, please proceed. 09:03

14 EXAMINATION 09:03

15 BY MR. HARBIN: 09:03

16 Q Dr. Stevick, would you state your full 09:03
17 name, please. 09:03

18 A Sure. It's Glen Stevick. 09:03

19 Q Okay. And we have met before. But, for 09:03
20 the record, I'm John Harbin. I'll be asking you 09:03
21 some questions about background -- your opinions and 09:03
22 background information. 09:04

23 You've given depositions before, correct? 09:04

24 A Yes, sir. 09:04

25 Q Can you approximate how many times you've 09:04

1 Q You see that?

11:00

2 A Yes.

11:00

3 Q You understand that 1- -- obviousness under

11:00

4 section 103 of the patent law is different from 102.

11:00

5 A Of course.

11:00

6 Q But you're incorporating, in part of your

11:00

7 102 analysis, obviousness principles --

11:00

8 A Right.

11:00

9 Q -- obviousness principles, correct?

11:00

10 A Sure, because some people might get stuck

11:00

11 on the fact that a discontinuous I-beam and a coil

11:00

12 are the same thing. And if you're going to be stuck

11:00

13 on that, okay. Here you go. But they're really the

11:00

14 same.

11:00

15 So we're addressing it every way, so it

11:00

16 really doesn't matter which view you take. But in

11:00

17 engineering analysis, when we have a strip run into

11:00

18 a flat surface, we often treat that as an I-beam for

11:00

19 analysis.

11:00

20 Q Let's go back to Aoki, which, again, is

11:01

21 Exhibit 9.

11:01

22 A Sure.

11:01

23 Q And I want to ask you about paragraph 127

11:01

24 of your opening report. It says -- it cites Aoki as

11:01

25 teaching that:

11:01

1 not grabbed in use. And it's a highly deformable 04:37
2 apparatus. It's an inflatable bed. So when you 04:37
3 grab it, you deform it and change the characteristic 04:37
4 of that peripheral air bag. 04:37
5 Q Let's talk about your manometer test. 04:37
6 A Sure. 04:37
7 Q You conducted it by placing one end of the 04:37
8 tube underneath the air mattress? 04:37
9 A Correct. 04:37
10 Q What does the manometer test measure? 04:37
11 A It shows that you get a high pressure when 04:37
12 you get on, forcing air out. And when you move, get 04:37
13 off, that corresponds to when you reverse the load 04:37
14 on a suction cup. You pull a vacuum. 04:38
15 Q Sir, in fairness, as engineering, a 04:38
16 manometer measures pressure changes, correct? 04:38
17 A Yes. 04:38
18 Q Okay. A manometer does not test for 04:38
19 airflow, correct? 04:38
20 A No. But we know that air flows from high 04:38
21 pressure to low pressure. 04:38
22 Q Okay. 04:38
23 A So we know -- in fact, many flowmeters are 04:38
24 actually based on calibration of a preference 04:38
25 difference test. 04:38

1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER

2 I, Marla Sharp, a stenographic reporter
3 certified in California, Oregon, and Washington,
4 hereby certify:

5 That the foregoing video-recorded
6 videoconference deposition of GLEN STEVICK, PhD, was
7 taken remotely before me on August 20, 2021, at
8 which time the witness was duly remotely sworn by
9 me;

10 That the testimony of the witness and all
11 colloquy and objections made at the time of the
12 deposition were recorded stenographically by me and
13 thereafter transcribed, said transcript being a true
14 copy of my shorthand notes thereof;

15 That review of the transcript was neither
16 requested nor waived before completion of the
17 deposition; () that the witness has failed or
18 refused to approve the transcript.

19 I further certify I am neither financially
20 interested in the action nor a relative or employee
21 of any attorney of any of the parties.

22 In witness whereof, I have subscribed my
23 name and signature this date, September 2, 2021.

24 *Marla Sharp*

25 Marla Sharp, RPR, CLR, CCRR,
OR CSR 17-0446, CA CSR 11924, WA CSR 3408